MOTION FILED
APR 22 1966

IN THE

SUPREME COURT OF THE UNITED STATES.

OCTOBER TERM, 1965.

No. 1046.

PEOPLE OF THE STATE OF ILLINOIS ex rel. GEORGE MUSSO, Madison County Treasurer and Ex-Officio Collector of Taxes of Madison County, Illinois,
Appellant,

vs.

CHICAGO, BURLINGTON AND QUINCY RR. CO., CHICAGO & NORTHWESTERN RR. CO., GULF, MOBILE AND OHIO RR. CO., CHICAGO AND EASTERN ILLINOIS RR. CO., ILLINOIS CENTRAL RR. CO., NEW YORK CENTRAL RR. CO., NEW YORK, CHICAGO & ST. LOUIS RR. CO., WABASH RR. CO., PENNSYLVANIA RR. CO., ILLINOIS TERMINAL RR. CO., ALTON & SOUTHERN RR. CO., and TERMINAL RAILROAD ASSOCIATION OF ST. LOUIS,
Appellees.

On Appeal from the Supreme Court of Illinois.

MOTION FOR LEAVE TO FILE BRIEF AMICUS CURIAE

and

BRIEF FOR SANGAMON COUNTY, ILLINOIS.

SANGAMON COUNTY, ILLINOIS,
By RAYMOND L. TERRELL,
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Appellees.

On Appeal from the Supreme Court of Illinois.

MOTION OF SANGAMON COUNTY, ILLINOIS, FOR LEAVE TO FILE BRIEF AMICUS CURIAE IN SUPPORT OF JURISDICTIONAL STATEMENT AND IN OPPOSITION TO APPELLEES' MOTION TO DISMISS OR AFFIRM.

Sangomon County, Illinois respectfully moves for leave to file the accompanying brief *amicus curiae* in support of the Appellant's Jurisdictional Statement and in opposition to Appellees' Motion to Dismiss or Affirm and represents as follows:

1. Sangamon County, Illinois is a duly constituted county and political subdivision of the State of Illinois pursuant to constitutional and legislative enactment. The undersigned State's Attorney and assistant state's attorney are authorized law officers for Sangamon County. Included within the boundaries of Sangamon County is the City of Springfield which since 1837 has been the capitol of Illinois. The population of Sangamon County in 1960 was 146,539. Local government is carried on in Sangamon County with heavy reliance on property tax revenues raised by 133 tax districts including 24 school districts.

2. Sangamon County has a direct interest in this case because there are pending before the Sangamon County Circuit Court at Springfield ten cases involving tax objections filed by the Chicago & Northwestern Railroad Company and the Gulf, Mobile & Ohio Railroad Company for the years 1958 through 1962, inclusive. These cases involve public revenues totaling in excess of $300,000 and the distribution of these monies is largely controlled by the judgments appealed to this Court in this case.

3. Sangamon County believes that the public importance of this case is great and desires to inform this Court of certain facts in support of the public importance.

4. Sangamon County has special knowledge which reflects the effect of the recent constitutional decisions of the Supreme Court of Illinois on the flexibility of the Director of Revenue of Illinois in valuing railroad property and desires to inform this Court thereof.

Wherefore, Sangamon County, Illinois prays that this Court enter its order granting leave to file the attached brief.

Respectfully submitted,

SANGAMON COUNTY, ILLINOIS,

By RAYMOND L. TERRELL,
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